

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF IOWA**

IN RE:

BDC GROUP, INC.,

Debtor.

Case No. 23-00484

**NOTICE OF MOTION FOR ORDER  
APPROVING COMPROMISE**

TO THE DEBTOR, CHAPTER 7 TRUSTEE, ALL CREDITORS AND PARTIES  
IN INTEREST:

NOTICE IS HEREBY GIVEN that Keystone Savings Bank filed a Motion for Order Approving Compromise with MidAmerican Energy Company ("Motion") in the above-captioned case on September 19, 2025.

NOTICE IS FURTHER GIVEN that objections to said Motion, if any, shall be filed with the Clerk of the Bankruptcy Court, 111 Seventh Avenue SE, Box 15, Cedar Rapids, IA 52401, with a copy to the undersigned attorney, Chapter 7 Trustee, the United States Trustee, and the Debtor, addresses below, on or before October 10, 2025.

NOTICE IS FURTHER GIVEN that if no objections are timely filed, an order may be entered granting the relief requested without further notice or hearing.

NOTICE IS FURTHER GIVEN that if any objections are timely filed, a hearing on the Motion and objections will be scheduled by separate notice.

Dated: September 19, 2025

Respectfully Submitted,

SIMMONS PERRINE MOYER BERGMAN PLC

/s/ Abram V. Carls

Eric W. Lam, AT0004416

Abram V. Carls, AT0011818

115 Third Street SE, Suite 1200

Cedar Rapids, IA 52401

Phone: 319-366-7641

Facsimile: 319-366-1917

elam@simmonsperrine.com

acarls@spmbllaw.com

ATTORNEYS FOR KEYSTONE SAVINGS BANK

Addresses:

Chapter 7 Trustee:  
Renee K. Hanrahan  
PO Box 1088  
Cedar Rapids, IA 52406-1088

Trustee's Counsel:  
Elizabeth Lally  
Spencer Fane LLP  
13815 FNB Parkway  
Suite 200  
Omaha, NE 68154

United States Trustee  
111 7<sup>th</sup> Ave. SE, Box 17  
Cedar Rapids, IA 52401

BDC Group, Inc.  
c/o Dennis Bruce RA  
1936 51<sup>st</sup> St. NW  
Cedar Rapids, IA 52402

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 19, 2025, a copy of the foregoing document was filed with the Clerk of Court for the United States Bankruptcy Court for the Northern District of Iowa using the CM/ECF system, and served electronically on those participants that receive service through the CM/ECF System. The undersigned further certifies that a copy of the foregoing document was served upon creditors and other parties in interest identified in the attached matrix, by causing the foregoing document to be enclosed in an envelope addressed to the same and deposited in a United States Post Office depository on September 19, 2025.

/s/ Abram V. Carls